

MASCHOFF BRENNAN GILMORE  
ISRAELSEN & MAURIEL LLP  
Kirk R. Harris (UBN 10221)  
*kharris@mabr.com*  
Sterling A. Brennan (UBN 10060)  
*sbrennan@mabr.com*  
95 South State Street, Suite 800  
Salt Lake City, UT 84111  
(801) 297-1850

Attorneys for LIFETIME PRODUCTS, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

LIFETIME PRODUCTS, INC., a Utah  
corporation,

Plaintiff,

v.

ICEBERG ENTERPRISES LLC, a  
Delaware limited liability company,

Defendant.

Case No. 2:25-cv-00498

**COMPLAINT FOR:  
(1) PATENT INFRINGEMENT; AND  
(2) DECLARATORY JUDGMENT**

JURY DEMANDED

**FILED UNDER SEAL**

Plaintiff Lifetime Products, Inc. (“Lifetime”) files this Complaint against defendant Iceberg Enterprises LLC (“Iceberg”), and in support thereof alleges as follows:

**I. PARTIES**

1. Lifetime is a Utah corporation duly organized and existing under the laws of the state of Utah, with its principal place of business at Building D12, Freeport Center, Clearfield, Utah 84016.

2. Iceberg, on information and belief, is a Delaware limited liability company with its principal place of business at 2700 South River Road, Suite 303, Des Plains, Illinois 60018.

## II. JURISDICTION AND VENUE

3. This is a civil action for patent infringement and declaratory judgment arising under the laws of the United States, 35 U.S.C. §§ 1 et seq., including but not limited to 35 U.S.C. §§ 271, 281, 283, 284, and 285 and the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq.

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 (federal question), 1338(a) (patents), and 28 U.S.C. § 2201 (declaratory judgment.)

5. This Court also has diversity jurisdiction pursuant to 28 U.S.C. §1332 (diversity) as the plaintiff, Lifetime, and defendant, Iceberg, are citizens of different states (Lifetime, deemed a citizen of Utah, and Iceberg, deemed a citizen of Delaware and Illinois) and the matter in controversy exceeds the sum or value of \$75,000.

### Personal Jurisdiction and Venue

6. [REDACTED]

## III. FACTUAL BACKGROUND

### The Parties

7. Lifetime is the world's leading manufacturer of blow-molded folding tables and chairs, blow-molded water sports equipment, and other home and garden and playground

equipment. Lifetime's position as a world leading manufacturer has been achieved by applying innovation and cutting-edge technology in plastics and metals to develop new products having superior strength and durability. Through these efforts Lifetime has been granted over 400 United States patents and many more worldwide.

8. Lifetime has spent and continues to spend significant time and resources to innovate and develop new technologically advanced products for which it seeks patent protection.

9. Iceberg is in the business of, among other things, blow molding, metal fabrication, and assembly.

\_\_\_\_\_

\_\_\_\_\_

114

\_\_\_\_\_

██████████

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The image consists of approximately 16 horizontal black bars of different lengths, stacked vertically. These bars represent redacted text from a document. The bars vary significantly in width and height, suggesting they cover multiple lines of text. Some bars are very thin, while others are thicker, possibly indicating bolded or larger font text was redacted. The overall pattern suggests a full page or several pages of information have been obscured.

**United States Patent No. 8,622,007**

22. United States Patent No. 8,622,007 (“the ’007 patent”), entitled “Table With Molded Plastic Table Top,” was duly issued on January 7, 2014, by the United States Patent and Trademark Office, and is presumed by law to be valid and enforceable (35 U.S.C. § 282). (A true and correct copy of the ’007 patent is attached hereto as Exhibit C.)

23. Lifetime is the owner by assignment of the '007 patent.

24. Lifetime holds all rights, title, and interest in and to the '007 patent, including the right to sue and recover for all past, present, and future infringements.

25. [REDACTED] Lifetime has not authorized, licensed, or otherwise permitted Iceberg to practice the '007 patent or to make, use, offer for sale, or sell any product or service covered by any claim of the '007 patent.

26. The '007 patent represents innovative advances in the field of furniture and more particularly furniture that may include molded plastic components. It describes and claims specific inventions that solved problems over the prior art and introduced innovative concepts that were not well understood, routine, or conventional. The inventions claimed in the '007 patent are not abstract ideas; they are tangible innovations that have real-world impact.

27. Claim 11 of the '007 claims:

A table comprising:

a molded plastic table top including an upper surface, a lower surface and a hollow interior portion disposed between the upper surface and the lower surface, the upper surface, the lower surface and the hollow interior portion integrally formed during a molding process as part of a unitary, one-piece construction;

a frame receiving portion integrally formed in the lower surface of the table top during the molding process as part of the unitary, one-piece construction, the frame receiving a portion including an upper surface and at least one side wall;

a plurality of depressions in the lower surface of the table top, at least a majority of the plurality of depressions generally extending in a first direction;

a plurality of channels disposed in the upper surface of the frame receiving portion, each channel of the plurality of channels generally extending aligned in a second direction different than the first direction;

a first support member connected to the table top;

and a second support member connected to the table top.

28. Without right of license or authorization or permission by Lifetime, Iceberg has made, used, offered for sale, sold, and/or imported products (“Accused Products”) that infringe at least claim 11 of the ’007 patent, as more fully set forth against an exemplary Accused Product in Exhibit D, attached hereto.

**First Claim for Relief**  
***Patent Infringement***

29. Lifetime realleges and incorporates herein the allegations set forth in the preceding paragraphs.

30. Iceberg has directly infringed, and continues to infringe, one or more claims (including, at least, claim 11) of the ’007 patent, in violation of 35 U.S.C. § 271(a) by, at least, making, using, selling, offering for sale, and/or importing the Accused Products within the United States.

31. The Accused Products are capable of performing and actually perform each limitation of one or more claims (including, at least, claim 11) of the ’007 patent as set forth in this Complaint.

32. Lifetime has been damaged by Iceberg’s infringement and is therefore entitled, pursuant to the Constitution (Art. I, Sec. 8, Cl.8) and 35 U.S.C. § 154(a), to a preliminary and permanent injunction preventing Iceberg’s further infringement of the ’007 patent and, under at least 35 U.S.C. § 284, to recover damages from Iceberg in an amount adequate to compensate for its acts of infringement, including Lifetime’s lost profits, but in no event less than a reasonable royalty for Iceberg’s acts of infringement, together with interest and costs as fixed by the Court.

**Second Claim for Relief**  
***Declaratory Judgment***

33. Lifetime realleges and incorporates herein the allegations set forth in the preceding paragraphs.

34. An actual and substantial case or controversy exists between Lifetime and Iceberg

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

37. [REDACTED]

[REDACTED]

[REDACTED]



#### **IV. PRAYER FOR RELIEF**

Lifetime prays that the Court grant it relief by entering a judgment in Lifetime's favor on each of its claims for relief, and specifically:

- A. find Iceberg liable for infringement of the asserted claims of the '007 patent;
- B. enter a preliminary and permanent injunction preventing Iceberg from committing acts of infringement of the '007 patent;
- C. award Lifetime damages adequate to compensate it for Iceberg's infringement of the '007 patent, pursuant to 35 U.S.C. § 284;
- D. find this case to be exceptional under 35 U.S.C. § 285 and award Lifetime its reasonable attorneys' fees;
- E. award Lifetime pre-judgment and post-judgment interest;
- F. enter a money judgment in Lifetime's favor and against Iceberg in the amount of Lifetime's lost profits and a reasonable royalty, plus interest and costs as allowed by law and or contract;
- G. [REDACTED]  
[REDACTED]  
[REDACTED] and
- H. award Lifetime such other and further relief as the Court deems just and proper.

#### **DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Lifetime hereby requests a trial by jury of all issues properly triable by jury.

DATED: June 23, 2025

Respectfully submitted,

MASCHOFF BRENNAN

By: /s/ Kirk R. Harris  
Attorneys for LIFETIME PRODUCTS, INC.